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via ecf

March 17, 2025

The Honorable Gregory H. Woods
District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 3/19/2025

MEMORANDUM ENDORSED

Re: Florence Rostami Law LLC v. Mitsuiya Industries, Co. Ltd.
Case No. 1:25-cv-1490-GHW

Dear Judge Woods:

We are counsel for Florence Rostami Law LLC (“Plaintiff”). Late last evening, counsel for Mitsuiya Industries, Co., Ltd. (“Defendant”) advised me by email that he intended to seek a pre-motion conference with the Court in lieu of filing an answer. Late in the evening of March 18, 2025, counsel for Defendant notified Plaintiff of its intent to file a motion to dismiss the complaint. This afternoon, pursuant to the Court’s Individual Rules, Defendant’s counsel filed a letter request for a pre-motion conference for the purpose of filing a motion in lieu of the answer to the Complaint in this matter to dismiss under Fed.R.Civ.P. Rule 12 and on the basis of *forum non conveniens*. [DOC No. 29] As stated in counsel for Defendant’s letter, Plaintiff intends to oppose Defendant’s motion.

By order entered at 3:56 pm today, the Court has directed that the pre-motion conference be conducted on Wednesday, March 26, 2025 at 3:00 pm. [DOC 30]

Because of this late notice and Plaintiff’s counsel’s personal and professional commitments in the five day period provided for under the Court’s Individual Rules, counsel for Plaintiff respectfully requests that the date for Plaintiff to file its letter in opposition be adjourned or extended to Tuesday, March 25, 2025.

I have conferred with counsel for Defendant who consents to this request.

This is the first request for an extension or adjournment by either party with respect to the time to seek a pre-motion conference or to respond to such request. Counsel for Plaintiff remains available should the Court require additional information regarding this request.

Respectfully submitted,

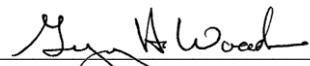
/s/Florence Rostami
Florence Rostami

cc: All counsel of record (via ECF)

Application granted. The deadline for Plaintiff to file a response to Defendant's pre-motion letter is extended to March 25, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 31.

SO ORDERED.

Dated: March 19, 2025
New York, New York



GREGORY H. WOODS
United States District Judge